

Data Protection Information for Job Applicants

(Joint Data Controllers - Article 26 (2) GDPR)

1. Preamble

There is cooperation between the controllers in the area of "Recruiting" in accordance with Article 26 GDPR in conjunction with Article 4 No. 7 GDPR (cooperation as joint controllers in the processing of personal data).

As part of this cooperation, it is possible and also necessary for the joint controllers to have access to your personal data. They are therefore jointly responsible for the protection of your personal data with regard to the processes described below. The main contents of the agreement between the controllers to fulfill their obligations under the GDPR are also described below.

2. General Information

2.1 Data Controllers

Joint Controllers	Data Controller A	ProVeg e. V. (Germany)
	Data Controller B	ProVeg International Incorporated (US) ProVeg C.I.C. (UK) Fundacja ProVeg (Poland) Stichting ProVeg (Netherlands) ProVeg South Africa NPC (South Africa) ProVeg z.s. (Czechia) The Shanghai Representative Office of ProVeg International Incorporated (China) ProVeg vzw (Belgium) ProVeg Food Awareness Organisation Incorporated Trustee (Nigeria) Pertubuhan ProVeg (Malaysia) ProVeg Foundation (India) Eco ProVeg Initiative Private Limited (India) Associação ProVeg (Brazil) Associação ProVeg (Portugal)

A complete listing of all organizations' addresses can be found in Appendix 1.

2.2 Recruiting project description

The purpose of data processing in the area of recruiting is to fill vacancies at all responsible parties through coordinated application management that utilizes synergies. Your application data is used to assess suitability and is of importance for the hiring decision.

We usually receive applications via our website, by email or our application portal. You will find more detailed information in Appendix 2.

In the case of agreed telephone interviews or those via (cloud-based) video telephony service providers and further steps in the application process, your relevant personal data will be made available to the respective person responsible and processed by them.

If the application process leads to recruitment, the application documents will be transferred to the shared personnel master data in our application portal.

3. Affected Groups of Persons and Data

The group of persons concerned are all applicants.

We process personal data that we receive from you as part of your application. This is the data that you provide to us by submitting the application documents and your details in job interviews.

We also visit profiles of applicants on professionally oriented social networks, if such exist. We do not visit profiles on private social networks.

We may also receive data from recruitment agencies to which you have submitted your application documents and which you suggest to us as candidates for a position. If references from previous employers are to be requested, this will be discussed separately with the applicants.

Relevant personal data is only that which is necessary for the selection of suitable candidates. These include, among others:

- Private Contact Details, such as
 - Surname
 - Name
 - Address
 - Email-Address
 - Telephone Number and other communication data

- Application correspondence, such as
 - Skills data
 - Professional Qualifications
 - Examination certificates

Personal data according to Art. 9 of the GDPR are neither processed nor stored.

4. Legal Basis and Purpose of Processing

We process personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). Processing solely takes place if it is permitted by law or if we have received your consent to process data.

4.1 Processing of your Data for the Purpose of Recruitment (Article 6 (1) (b) GDPR, Section 26 BDSG in conjunction with Article 88 GDPR)

Data processing is carried out for the purpose of selecting personnel to fill vacancies. These are pre-contractual measures that serve to initiate employment contracts.

4.2 Processing of your Data on the Basis of Legitimate Interests in the Context of Balancing of Interests (Article 6 (1)(f) GDPR)

Where necessary, we process your data beyond the actual initiation or fulfillment of the contract to protect our legitimate interests or those of third parties - provided that your interests worthy of protection do not prevail - such as in the following cases:

Background research for applicants for positions with particular compliance relevance:

We have a legitimate interest in researching whether applicants may be shortlisted for certain fields of activity based on the information provided.

Improving our application process and applicant satisfaction surveys:

We use findings from surveys or individual interviews on the subject of applicant satisfaction to identify potential for improvement and to make the application process more effective. Where possible, we process your contact data in anonymised form, i.e. in such a way that you cannot be directly identified.

Defense against and assertion of legal claims:

In addition, we store data of applicants in order to be able to defend ourselves against any claims asserted, for example under the AGG. We disclose personal data to offices, authorities and courts if this is necessary to defend ourselves in legal disputes or to enforce legal claims.

4.3 Processing of your Data on the Basis of legal Requirements (Article 6 (1) (c) GDPR)

We also process your personal data if we are required to do so by law. This includes, for example, feedback to the employment agency and information to offices, authorities and courts, insofar as we are obliged to do so.

4.4 Processing your data because of your voluntary consent (Article 6 (1) (a) GDPR)

We process your personal data based on your voluntarily given consent if you agreed to have your data stored in a “talent pool”.

5. Joint Responsibility and Allocation of Responsibilities for Processing Stages

We treat the fact that you are applying to us and your personal data with confidentiality. Within our company, only those departments and employees who need access to your data to fulfill the above-mentioned purposes will have access to it.

Even if there is joint responsibility, the responsible parties must fulfill the data protection obligations in accordance with their respective responsibilities for the individual proceedings stages described below.

Within the framework of joint controllership, ProVeg e. V. and the aforementioned organizations are responsible for the processing of personal data in the process stages described below:

5.1 Incoming Applications

a) Application via ProVeg application management tool

When we receive your application, ProVeg e. V. collects your data regardless of the method of application submission. Your personal data will be collected. The controller ProVeg e. V. is primarily subject to the information obligations pursuant to Articles 13, 14 and 26 para. 2 sentence 2 GDPR. The data is collected and stored in the current personnel management system.

If you are a suitable applicant for the position, ProVeg e. V. will make your data available to the ProVeg organization for whose position you have applied so that the ProVeg organization can review your application documents.

b) Voluntary Talent Pool

Applicants may voluntarily choose to be part of the voluntary talent pool. If you have agreed to be part of this talent pool, ProVeg e. V. or other Proveg organizations may use your application data to contact you regarding relevant vacancies.

5.2 Application Process

In the further procedure, your data will be processed by analyzing your application documents.

ProVeg e. V. is primarily responsible for processing your above-mentioned private contact data in order to establish telephone or e-mail contact with you and to manage the application process.

In particular, telephone conversations and at least one conversation via a video conferencing service are possible. Assessment center tasks will be provided to you via the third-party provider "Criteria Corp". During the application process, the data may be sent to the ProVeg organization to which you have applied, e.g. for the evaluation of your skillset and any answers in the assessment center.

The digital interview at the end of the process takes place jointly with ProVeg e. V. and the respective decision-makers of the respective ProVeg organization.

5.3 Recruitment

In the event of recruitment, your data will be stored in the personnel management tool as an "employee" and will be accessible to ProVeg e. V. and the respective ProVeg organization as well as the leads of the respective entity.

6. Agreements of the Data Controllers regarding their Data Protection Obligations

6.1 Information obligations pursuant to Articles 13 and 14 GDPR

ProVeg e. V. is responsible for the initial information obligation.

6.2 Contact Point for the Assertion of Data Subject Rights in Accordance with the GDPR

The primary point of contact for asserting your rights is ProVeg e. V..

Irrespective of this, data subjects can always assert their rights in accordance with Art. 26 (3) GDPR against each of the controllers. The controllers shall inform each other immediately of any claims asserted by the data subjects and provide each other with all information necessary for processing.

7. Further Data Processing

With regard to the transfer of data to recipients outside of the controllers named here, please note that we only pass on information about you if it is required by law, if you have given your consent or if we are authorized to provide information.

Under these conditions, recipients of personal data may be, for example, public bodies and institutions (e.g. authorities) if there is a legal or official obligation to pass on your data.

We also work together with service providers who support us. We only transfer your personal data to our service providers and co-operation partners if there is a legal basis for this. These are service providers in the following areas

- Personnel consultants and recruitment agencies
- Headhunters
- Service providers for checking applicant qualifications

8. Storage Period

Where necessary, we process and store your personal data for as long as is necessary to fulfill the purpose of processing or to comply with statutory retention obligations.

If you are not selected for the position for which you have applied, we will delete your data 6 (six) months from the date of rejection.

If an employment contract is concluded between you and the ProVeg organization, your application documents will be included in the personnel file and stored for at least the duration of the employment relationship and subsequent retention obligations.

If and insofar as you have given us your consent to data processing for specific purposes, such as to continue to store your data and to contact you in order to offer you further vacancies (so-called applicant pool), the processing period results from the purpose of the consent given.

9. Transfer to a third country

ProVeg e. V. will only transfer data to organizations in countries outside the European Economic Area (so-called third countries) if this is permitted. It is permissible if

- there is a legal basis for processing the data in accordance with Article 6 GDPR
- the requirements of Article 44 et seq. GDPR with regard to data processing in the respective third country, and
- there is a contractual basis pursuant to Article 28 GDPR with the respective contractual partner.

We also use service providers located in third countries outside the European Union to process your data. Countries outside the European Union handle the protection of personal data differently than countries within the European Union. There is currently no decision by the EU Commission that these third countries generally offer an adequate level of protection.

We have therefore taken special measures to ensure that your data is processed just as securely in third countries as it is within the European Union.

Where we use third country service providers, we conclude the data protection agreement (standard data protection clauses) provided by the Commission of the European Union for the processing of personal data in third countries with them. This provides suitable guarantees for the protection of your data with service providers in the third country.

Some of our providers are headquartered in the USA. Due to the Data Privacy Framework that has existed between the USA and the EU since 2023, it has been possible for these companies to be certified by US data protection authorities and thus confirm their level of data protection since it came into force. Some of our service providers have already been certified.

You can request information about the companies that have already been certified or a copy of the appropriate guarantees using the contact details above.

A detailed list of all these service providers can be found in Appendix 2.

10. Your Rights

10.1 Rights under the GDPR

You have the following rights under the EU General Data Protection Regulation:

- If your personal data is processed, you have the right to **obtain information** about the personal data stored about you (Article 15 GDPR).
- If incorrect personal data is processed, you have the right to **rectification** (Article 16 GDPR).
- If the legal requirements are met, you can request the **erasure** or **restriction** (Article 17 and 18 GDPR) of processing and
- **object** to processing where your data is processed on the basis of legitimate interest (Article 21 GDPR)
- **withdraw** your consent (Article 6 and 7 GDPR).

To exercise your rights, please contact

dataprotection@proveg.org.

I You have the right to **lodge a complaint** (Article 77 GDPR) with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes this Regulation.

10.2 Data protection officer

We have also appointed a data protection officer. You can reach them at

Datenschutz Nord GmbH
Kurfürstendamm 212
10719 Berlin
office@datenschutz-nord.de

Appendix 1:

Controller	Seat / Adresse
ProVeg e. V. (Germany)	Genthiner Straße 48, 10785 Berlin, Germany
ProVeg International Incorporated (US)	82 Wendell Ave, Suite 100, Pittsfield, MA 01201-7066, United States of America
ProVeg C.I.C. (UK)	63/66 Hatton Garden, London, EC1N 8LE, United Kingdom
Fundacja ProVeg (Poland)	Ul. gen. Józefa Zajęczka 11/92, 01-510 Warszawa, Poland
Stichting ProVeg (the Netherlands)	Kantoorverzamelgebouw De Alchemist, Kon. Wilhelminalaan 8, 3527 LD Utrecht, The Netherlands
ProVeg South Africa NPC (South Africa)	13 Juliana Veld North, Pinelands, Cape Town, 7405 South Africa
ProVeg z.s (Czechia)	Londýnská 254/7 Vinohrady, 120 00 Praha 2, Czech Republic
The Shanghai Representative Office of ProVeg International Incorporated (China)	2405, 24F, 1018 Changning Road, Shanghai, 200042, China
ProVeg vzw (Belgium)	Steendam 84, 9000 Gent, Belgium
ProVeg Food Awareness Organisation (Nigeria)	29a Ikorodu Crescent (Dolphin Estate), Ikoyi, 101222 Lagos, Bundesrepublik Nigeria
Pertubuhan ProVeg (Malaysia)	84 Jln Athinahapan Satu, Taman Tun Dr Ismail, 60000 Kuala Lumpur, Malaysia
ProVeg Foundation (India)	H-102, Purva Fountain, Square Munnekolal, Marathahalli Colony, Bangalore North, Bangalore- 560037, Karnataka, India
Eco ProVeg Initiative Private Limited (India)	H-102, Purva Fountain, Square Munnekolal, Marathahalli Colony, Bangalore North, Bangalore- 560037, Karnataka, India
Associação ProVeg (Brazil)	Rua Coronel José Eusebio 95, Casa 13, Higienópolis, CEP 01239-030, São Paulo, Brazil

Associação ProVeg (Portugal)	Rua da Constituição,nº 1374, 3º direito, 4250-161 Porto, Tv. Regado 40, 4250-337 Porto
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Appendix 2:

Tool	Seat of Contractual Party	Purpose
Teamtaylor	Teamtaylor AB, Sweden	_Application management
Personio	Personio SE & Co. KG, Deutschland	_Personnel management
Google Workspace	Google LLC, CA, USA	_Email service provider _Video call service provider